

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Anchor Glass Container Corporation
200 West Belleview Drive
Lawrenceburg, Indiana 47025**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T029-6043-00007	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary glass container manufacturing operation.

Responsible Official: Gordon M. Stewart, Vice President of Engineering
Source Address: 200 West Belleview Drive, Lawrenceburg, Indiana 47025
Mailing Address: 200 West Belleview Drive, Lawrenceburg, Indiana 47025
SIC Code: 3221
County Location: Dearborn
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) one (1) natural gas, propane, or numbers 2, 4, or 6 fuel oil-fired glass furnace, identified as Furnace #1, constructed in 1951, with a maximum design capacity of 421 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST1;
- (2) one (1) natural gas, propane, or numbers 2, 4, or 6 fuel oil-fired glass furnace, identified as Furnace #2, constructed in 1959, with a maximum design capacity of 350 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST2;
- (3) one (1) raw materials batch storage process, constructed in 1951, with a maximum capacity of 1000 tons per day, with emissions controlled by baghouses ST6, ST7, ST8, and ST9;
- (4) one (1) raw materials batch weighing and mixing process, constructed in 1951, with a maximum capacity of 1000 tons per day, with emissions controlled by baghouses ST10, ST11, and ST12;
- (5) one (1) raw materials batch silo, constructed in 1951, with a maximum capacity of 1000 tons per day, with emissions controlled by baghouses ST4 and ST5; and
- (6) one (1) underground conveyor, constructed in 1951, with a maximum capacity of 1000 tons per day, controlled by a baghouse ST3.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) cullet crushing operations [326 IAC 6-1-2];
- (2) mold swabbing operations, including multiple forming machines [326 IAC 6-1-2];
- (3) hot end treatment operations, including multiple coating hoods [326 IAC 6-1-2];
- (4) six (6) parts washing stations used for maintenance purposes [326 IAC 8-3-2];
- (5) mold shop operations [326 IAC 6-1-2]; and
- (6) one (1) cardboard baler [326 IAC 6-1-2].

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Condition B.14 entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM .
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, or those specifically listed in B.16(b) (Deviations from Permit Requirements and Conditions), constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded

due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

-
- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same

act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Condition B.13 - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.17 Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection. Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, , takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, , any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-1.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management

Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:
 - (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
 - (2) For each such Section 502(b)(10) of the Clean Air act change, the required written notification shall include the following:
 - (i) A brief description of the change within the source;
 - (ii) The date on which the change will occur;
 - (iii) Any change in emissions; and
 - (iv) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved as required by and in accordance with the applicable provisions of 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.24 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.26 Advanced Source Modification Approval [326 IAC 2-7-5(16)]

The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 if such modifications occur only during the term of this permit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period, as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Stack Height [326 IAC 1-7]
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on June 3, 1996.
- (b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the

approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
[326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM, . The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been

predicted.

- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.
- (c) IDEM, OAM reserves that authority to take any actions allowed under law to resolve noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the

“responsible official” as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in

any quarter.

- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the PMP did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Condition C.17 - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Condition B.16 - Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

one (1) natural gas, propane, or numbers 2, 4, or 6 fuel oil-fired glass furnace, identified as Furnace #1, constructed in 1951, with a maximum design capacity of 421 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST1

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-1-8.1]

Pursuant to 326 IAC 6-1-8.1 (Nonattainment Area Particulate Limitations), the particulate matter emissions from the glass Furnace #1 shall not exceed 1.0 pound per ton of glass produced and 48.0 tons per year. Compliance with the 48.0 tons per year limit will be determined each month by use of the following equation:

$$PM = (EF * P) / 2000$$

where:

PM = the amount of PM emitted (tons per year)

EF = the PM emission factor determined by the most recent OAM approved stack test
(lbs PM / ton glass produced)

P = the production of glass during the most recent twelve month period (tons glass / year).

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1]

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), when combusting number 2 or number 4 fuel oil, the SO₂ emissions from the combustion of fuel oil in Furnace #1 shall not exceed 0.5 pound per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 2 fuel oil shall not exceed 0.5 weight percent.

D.1.3 Sulfur Dioxide (SO₂) [326 IAC 7-4]

Pursuant to 326 IAC 7-4 (Sulfur Dioxide Emission Limitations) and OP 15-03-88-0095, issued May 31, 1984, when combusting number 6 fuel oil, the SO₂ emissions from the combustion of fuel oil in Furnace #1 shall not exceed 1.4 pounds per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 6 fuel oil shall not exceed 1.28 weight percent.

D.1.4 Arsenic [40 CFR Part 61.160, Subpart N]

Pursuant to 40 CFR Parts 61.160, Subpart N (National Emission Standards For Inorganic Arsenic Emissions From Glass Manufacturing Plants) arsenic shall not be used as a raw material in Furnace #1. Therefore, the requirements of this rule shall not apply.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period between 30 and 36 months after issuance of this permit or within 180 days after startup, whichever is later, the Permittee shall perform PM testing using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.1.1. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.1.7 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the #2 fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight and that the #6 fuel oil sulfur content does not exceed 1.28% by weight by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a certification;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the furnace, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Visible Emissions Notations

- (a) Daily visible emission notations of the Furnace #1 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency

and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions from the combustion of fuel oil in pounds per million Btu of heat input;
 - (3) The calendar month average heat content of the fuel oil used;
 - (4) The calendar month average sulfur content of the fuel oil used;
 - (5) A certification, signed by the owner or operator, that the records of the fuel oil supplier certifications represent all of the fuel oil combusted during the period; and
 - (6) Fuel oil supplier certifications, which shall contain, as a minimum, the following:
 - (i) The name of the fuel oil supplier; and
 - (ii) A statement from the fuel oil supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.8, the Permittee shall maintain records of daily visible emission notations of the Furnace #1 stack exhaust.
- (c) All records shall be maintained in accordance with Condition C.21 - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2 and D.1.3 in any compliance period when fuel oil was combusted, and the natural gas fired boiler certification, shall be submitted to the address listed in Condition C.22 - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

one (1) natural gas, propane, or numbers 2, 4, or 6 fuel oil-fired glass furnace, identified as Furnace #2, constructed in 1959, with a maximum design capacity of 350 tons of glass per day, with no abatement equipment present and emissions exhausting to stack ST2

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-1-8.1]

Pursuant to 326 IAC 6-1-8.1 (Nonattainment Area Particulate Limitations), the particulate matter emissions from the glass Furnace #2 shall not exceed 1.0 pound per ton of glass produced and 42.80 tons per year. Compliance with the 42.8 tons per year limit will be determined each month by use of the following equation:

$$PM = (EF * P) / 2000$$

where:

PM = the amount of PM emitted (tons per year)

EF = the PM emission factor determined by the most recent OAM approved stack test
(lbs PM / ton glass produced)

P = the production of glass during the most recent twelve month period (tons glass / year).

D.2.2 Sulfur Dioxide (SO₂) [326 IAC 7-1]

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), when combusting number 2 fuel oil, the SO₂ emissions from the combustion of fuel oil in Furnace #2 shall not exceed 0.5 pound per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 2 fuel oil shall not exceed 0.5 weight percent.

D.2.3 Sulfur Dioxide (SO₂) [326 IAC 7-4]

Pursuant to 326 IAC 7-4 (Sulfur Dioxide Emission Limitations), when combusting number 6 fuel oil, the SO₂ emissions from the combustion of fuel oil in Furnace #2 shall not exceed 1.4 pounds per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 6 fuel oil shall not exceed 1.28 weight percent.

D.2.4 Arsenic [40 CFR Part 61.160, Subpart N]

Pursuant to 40 CFR Parts 61.160, Subpart N (National Emission Standards For Inorganic Arsenic Emissions From Glass Manufacturing Plants) arsenic shall not be used as a raw material in Furnace #2. Therefore, the requirements of this rule shall not apply.

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.2.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

On or before October 27, 2003, the Permittee shall perform PM testing using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.2.1. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.2.7 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the #2 fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight and that the #6 fuel oil sulfur content does not exceed 1.28 percent by weight by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a certification;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the furnace, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.8 Visible Emissions Notations

- (a) Daily visible emission notations of the Furnace #2 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.2 and D.2.3, the Permittee shall maintain records in accordance with (1) through (6) below.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions from the combustion of fuel oil in pounds per million Btu of heat input;
 - (3) The calendar month average heat content of the fuel oil used;
 - (4) The calendar month average sulfur content of the fuel oil used;
 - (5) A certification, signed by the owner or operator, that the records of the fuel oil supplier certifications represent all of the fuel oil combusted during the period; and
 - (6) Fuel oil supplier certifications, which shall contain, as a minimum, the following:
 - (i) The name of the fuel oil supplier; and
 - (ii) A statement from the fuel oil supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.2.8, the Permittee shall maintain records of daily visible emission notations of the Furnace #2 stack exhaust.
- (c) All records shall be maintained in accordance with Condition C.21 - General Record Keeping Requirements, of this permit.

D.2.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1, D.2.2 and D.2.3 in any compliance period when fuel oil was combusted, and the natural gas fired boiler certification, shall be submitted to the address listed in Condition C.22 - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

one (1) raw materials batch storage process, constructed in 1951, with a maximum capacity of 1000 tons per day, with emissions controlled by baghouses ST6, ST7, ST8, and ST9

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Matter Limitations), the particulate matter emissions from the raw materials batch storage process shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Condition C.9 - Performance Testing.

D.3.4 Baghouses [326 IAC 2-7-6(1)]

The baghouses ST6, ST7, ST8, and ST9 shall be in operation and control emissions from the batch storage process at all times that the batch storage process is in operation, in order to comply with the limit in condition D.3.1.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.5 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouses ST6, ST7, ST8, and ST9 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.3.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the raw materials batch storage process when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.3.7 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.3.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses ST6, ST7, ST8, and ST9 used in conjunction with the raw materials batch storage process, at least once daily when the raw materials batch storage process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses ST6, ST7, ST8, and ST9 shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Condition C.14 - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.9 Record Keeping Requirements

- (a) To document compliance with Condition D.3.5, the Permittee shall maintain records of daily visible emission notations of the raw materials batch storage process stack exhaust.
- (b) To document compliance with Condition D.3.8, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.3.6, the Permittee shall maintain records of the results of the inspections required under Condition D.3.6 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Condition C.21 - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

one (1) raw materials batch weighing and mixing process, with a maximum capacity of 1000 tons per day, constructed in 1951, with emissions controlled by baghouses ST10, ST11, and ST12

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Matter Limitations), the particulate matter emissions from the raw materials batch weighing and mixing process shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Condition C.9 - Performance Testing.

D.4.4 Baghouses [326 IAC 2-7-6(1)]

The baghouses ST10, ST11, and ST12 shall be in operation and control emissions from the raw materials batch weighing and mixing process at all times that the raw materials batch weighing and mixing process is in operation, in order to comply with this limit.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.5 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouses ST10, ST11, and ST12 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.4.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the raw materials batch weighing and mixing process when venting to the atmosphere. Baghouse inspections shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.4.7 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.4.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses ST10, ST11, and ST12 used in conjunction with the raw materials batch weighing and mixing process, at least once daily when the raw materials batch weighing and mixing process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses ST10, ST11, and ST12 shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Condition C.14 - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.9 Record Keeping Requirements

- (a) To document compliance with Condition D.4.5, the Permittee shall maintain records of daily visible emission notations of the raw materials batch weighing and mixing process stack exhausts.
- (c) To document compliance with Condition D.4.8, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.4.6, the Permittee shall maintain records of the results of the inspections required under Condition D.4.6 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Condition C.21 - General Record Keeping Requirements, of this permit.

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

one (1) raw materials batch silo, with a maximum capacity of 1000 tons per day, constructed in 1951, with emissions controlled by baghouses ST4 and ST5

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Matter Limitations), the particulate matter emissions from the raw materials batch silo shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.5.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Condition C.9 - Performance Testing.

D.5.4 Baghouses [326 IAC 2-7-6(1)]

The baghouses ST4 and ST5 shall be in operation and control emissions from the raw materials batch silo at all times that the raw materials batch silo is loading or unloading, in order to comply with this limit.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.5 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouses ST4 and ST5 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month

and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.5.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the raw materials batch silo when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.5.7 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.5.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses ST4 and ST5 used in conjunction with the raw materials batch silo, at least once daily when the raw materials batch silo is loading or unloading when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses ST4 and ST5 shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Condition C.14 - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.9 Record Keeping Requirements

- (a) To document compliance with Condition D.5.5, the Permittee shall maintain records of daily visible emission notations of the raw materials batch silo stack exhaust.

- (b) To document compliance with Condition D.5.8, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.5.6, the Permittee shall maintain records of the results of the inspections required under Condition D.5.6 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Condition C.21 - General Record Keeping Requirements, of this permit.

SECTION D.6

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

one (1) underground conveyor, with a maximum capacity of 1000 tons per day, controlled by baghouse ST3

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Matter Limitations), the particulate matter emissions from the underground conveyor shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.6.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limits specified in Condition D.6.1 shall be determined by a performance test conducted in accordance with Condition C.9 - Performance Testing.

D.6.4 Baghouse [326 IAC 2-7-6(1)]

The baghouse ST3 shall be in operation and control emissions from the underground conveyor at all times that the underground conveyor is in operation, in order to comply with this limit.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.5 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse ST3 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions

for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.6.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the underground conveyor when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.6.7 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.6.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse ST3 used in conjunction with the underground conveyor, at least once daily when the underground conveyor is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse ST3 shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Condition C.14 - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.9 Record Keeping Requirements

- (a) To document compliance with Condition D.6.5, the Permittee shall maintain records of daily visible emission notations of the underground conveyor stack exhaust.
- (b) To document compliance with Condition D.6.8, the Permittee shall maintain the following:

- (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
- (2) Documentation of all response steps implemented, per event .
- (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
- (4) Quality Assurance/Quality Control (QA/QC) procedures.
- (5) Operator standard operating procedures (SOP).
- (6) Manufacturer's specifications or its equivalent.
- (7) Equipment "troubleshooting" contingency plan.
- (8) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.6.6, the Permittee shall maintain records of the results of the inspections required under Condition D.6.6 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Condition C.21 - General Record Keeping Requirements, of this permit.

SECTION D.7

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

one (1) cullet crushing operation

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Matter Limitations), the particulate matter emissions from the cullet crushing operation shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

Compliance Determination Requirements

D.7.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Condition C.9 - Performance Testing.

SECTION D.8 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

mold swabbing operations, including multiple forming machines

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Matter Limitations), the particulate matter emissions from the mold swabbing operations shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

Compliance Determination Requirements

D.8.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.8.1 shall be determined by a performance test conducted in accordance with Condition C.9 - Performance Testing.

SECTION D.9

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

hot end treatment process, including multiple coating hoods

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.9.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Matter Limitations), the particulate matter emissions from the hot end treatment process shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

Compliance Determination Requirements

D.9.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.9.1 shall be determined by a performance test conducted in accordance with Condition C.9 - Performance Testing.

SECTION D.10

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

six (6) parts washing stations used for maintenance purposes

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.10.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaners with a cover;
- (b) Equip the cleaners with a facility for draining cleaned parts;
- (c) Close the degreaser covers whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.10.2 Hazardous Air Pollutants (HAPs)

Pursuant to the 40 CFR Part 63 National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning, Subpart T, the solvent used in the parts washers shall not contain any of the following halogenated solvents in concentrations greater than five percent by weight: methylene chloride, 1,1,1-trichloroethane, trichloroethylene, perchloroethylene, carbon tetrachloride, or chloroform. Therefore, the requirements of this NESHAP shall not apply.

SECTION D.11

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Mold shop operations

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.11.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Matter Limitations), the particulate matter emissions from the mold shop operations shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

Compliance Determination Requirements

D.11.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.11.1 shall be determined by a performance test conducted in accordance with Condition C.9 - Performance Testing.

SECTION D.12

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

one (1) cardboard baler

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.12.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Matter Limitations), the particulate matter emissions from the cardboard baler shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

Compliance Determination Requirements

D.12.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.10.1 shall be determined by a performance test conducted in accordance with Condition C.10 - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Anchor Glass Container Corporation
Source Address: 200 West Belleview Drive, Lawrenceburg, Indiana 47025
Mailing Address: 200 West Belleview Drive, Lawrenceburg, Indiana 47025
Part 70 Permit No.: T029-6043-00007

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Anchor Glass Container Corporation
Source Address: 200 West Belleview Drive, Lawrenceburg, Indiana 47025
Mailing Address: 200 West Belleview Drive, Lawrenceburg, Indiana 47025
Part 70 Permit No.: T029-6043-00007

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)
C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9** 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C)
C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT**

COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Anchor Glass Container Corporation
Source Address: 200 West Belleview Drive, Lawrenceburg, Indiana 47025
Mailing Address: 200 West Belleview Drive, Lawrenceburg, Indiana 47025
Part 70 Permit No.: T029-6043-00007
Facility: Furnace #1
Parameter: Sulfur content and heat content of fuel oil used, amount of fuel oil used, and SO₂ emissions
Limits: SO₂ emissions of 0.5 lb/MMBTU of heat input when combusting #2 or #4 fuel oil and 1.4 lb/MMBTU of heat input when combusting #6 fuel oil

Month: _____ Year: _____

Month	Type of Fuel Used (#2 or #6)	Sulfur Content (%)	Heat Content	Fuel usage (gal/month)	SO ₂ Emissions (lb/MMBTU)

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Anchor Glass Container Corporation
Source Address: 200 West Belleview Drive, Lawrenceburg, Indiana 47025
Mailing Address: 200 West Belleview Drive, Lawrenceburg, Indiana 47025
Part 70 Permit No.: T029-6043-00007
Facility: Furnace #2
Parameter: Sulfur content and heat content of fuel oil used, amount of fuel oil used, and SO₂ emissions
Limits: SO₂ emissions of 0.5 lb/MMBTU of heat input when combusting #2 or #4 fuel oil and 1.4 lb/MMBTU of heat input when combusting #6 fuel oil

Month: _____ Year: _____

Month	Type of Fuel Used (#2 or #6)	Sulfur Content (%)	Heat Content	Fuel usage (gal/month)	SO ₂ Emissions (lb/MMBTU)

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Anchor Glass Container Corporation
Source Address: 200 West Belleview Drive, Lawrenceburg, Indiana 47025
Mailing Address: 200 West Belleview Drive, Lawrenceburg, Indiana 47025
Part 70 Permit No.: T029-6043-00007
Facility: Furnace #1
Parameter: production rate (tons per 12 consecutive month period)
Limit: Furnace #1: 48 tons/12 consecutive month period

Compliance to be determined by the following equation:

$PM = (EF * P) / 2000$ where:
PM = the amount of PM emitted (tons per year)
EF = the PM emission factor determined by the most recent OAM approved stack test
(lbs PM / ton glass produced)
P = the production of glass during the most recent twelve month period (tons glass / year).

YEAR: _____

Facility	Month	Column 1	Column 2	P = Column 1 + Column 2	PM emission factor	PM = (EF * P) / 2000
		Glass Produced This Month	Glass Produced Previous 11 Months	12 Month Total Glass Produced	(lbs PM / ton glass produced	Emissions from furnace
Furnace #1	Month 1					
Furnace #1	Month 2					
Furnace #1	Month 3					

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT**

COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Anchor Glass Container Corporation
Source Address: 200 West Belleview Drive, Lawrenceburg, Indiana 47025
Mailing Address: 200 West Belleview Drive, Lawrenceburg, Indiana 47025
Part 70 Permit No.: T029-6043-00007
Facility: Furnace #2
Parameter: production rate (tons per 12 consecutive month period)
Limit: Furnace #2: 42.8 tons/12 consecutive month period

Compliance to be determined by the following equation:

$PM = (EF * P) / 2000$ where:
PM = the amount of PM emitted (tons per year)
EF = the PM emission factor determined by the most recent OAM approved stack test
(lbs PM / ton glass produced)
P = the production of glass during the most recent twelve month period (tons glass / year).

YEAR: _____

Facility	Month	Column 1	Column 2	P = Column 1 + Column 2	PM emission factor	PM = (EF * P) / 2000
		Glass Produced This Month	Glass Produced Previous 11 Months	12 Month Total Glass Produced	(lbs PM / ton glass produced	Emissions from furnace
Furnace #2	Month 1					
Furnace #2	Month 2					
Furnace #2	Month 3					

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Anchor Glass Container Corporation
Source Address: 200 West Belleview Drive, Lawrenceburg, Indiana 47025
Mailing Address: 200 West Belleview Drive, Lawrenceburg, Indiana 47025
Part 70 Permit No.: T029-6043-00007

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Anchor Glass Container Corporation
Source Location: 200 West Belleview Drive, Lawrenceburg, Indiana 47025
County: Dearborn
SIC Code: 3221
Operation Permit No.: T 029-6043-00007
Permit Reviewer: Nisha Sizemore

On July 2, 1998, the Office of Air Management (OAM) had a notice published in the Register Publication, Lawrenceburg, Indiana, stating that Anchor Glass Container Corporation had applied for a Part 70 Operating Permit to operate a glass manufacturing operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On July 31, 1998, Anchor Glass Container Corporation submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

General Comments

Comment #1

Please indicate the permit issuance date, expiration date, and all modification dates/numbers on the permit cover page. Please place a revision date in the document header on each page of the permit. This will help ensure that future permit modifications are efficiently tracked.

Response #1

Upon final issuance, the permit cover page will state the issuance date. Conditions B.3 and B.5 both address the term of the permit and the expiration date. If any modifications are made to the permit after final issuance, the modification dates and numbers will be placed on the permit.

Comment #2

Please capitalize throughout F for furnace and N for Number where it follows a unit name, such as Furnace Number.

Response #2

The OAM has capitalized as suggested.

Comment #3

Anchor Glass requests that the four emission units associated with the raw materials batch house (batch storage, batch weighing and mixing, batch silo, and underground conveyor) be combined as a single source called "batch house". The batch house is a complex raw materials handling process consisting of several different storage vessels and conveyors. Tracking and documenting compliance would be simplified by combining the four segments as one emission unit in the permit.

Response #3

These emission units each have their own individual requirements. By separating them, it is clear that each individual emission unit must comply with the requirements listed in that particular Section D of the permit. Since the OAM views these units as separate, the permit should list them as separate. There have been no changes to the permit resulting from this comment. Listing the units in separate D Sections of the permit does not result in requiring more record keeping or reporting. The same amount of tracking and documentation would apply no matter whether the units were listed in separate D Sections of the permit, or together in one Section D of the permit.

Comment #4

Anchor Glass requests clarification that a permit modification would not be required to replace the raw materials baghouses, provided the replacements were of similar design and construction to those already in place. This replacement in kind would strictly entail a letter of notification to IDEM. This appears to be allowed under 326 IAC 2-7-12 (Part 70 Permits: Modifications).

Response #4

The OAM would need to review the specific proposed replacement before being able to state what type of modification would be required upon replacement of a control device. The replacement may only require a minor permit modification, or if compliance is somewhat questionable with the new control device, a stack test requirement may need to be added to the permit, in which case, a significant modification would be necessary. If Anchor Glass intends to replace some equipment, it would be necessary to inform the OAM of the exact equipment to be replaced. At that time the OAM would review the changes and complete the appropriate modification at that time. This issue is also addressed in Comment/Response #51.

Comment #5

If new baghouses were to be installed on existing uncontrolled emission points, would these new baghouses require a permit modification? Anchor Glass requests that a letter of notification be considered acceptable for this purpose under 326 IAC 2-7-12 (Part 70 Permits: Modifications).

Response #5

If the new baghouses are used so that the emission unit(s) can comply with the rules and permit conditions or so that the source can report less actual emissions, then a permit modification would be necessary. If a control device is used to comply with rules or permit conditions, then the permit must contain specific compliance monitoring conditions necessary to ensure proper operation of the control device(s). These conditions would need to be added to the permit via a permit modification. Again, the specific proposed changes would need to be reviewed by the OAM prior to making such a decision.

Comment #6

Anchor Glass requests that IDEM consider allowing additional operational flexibility for the two furnaces. Please refer to Bob Metzger's letter to IDEM dated May 19, 1998. This requested language should be included in B.22 on page 18, and under furnace requirements in the specific D Section of the permit. Anchor Glass requests that specific citations listed in the permit include 326 IAC 2-5.1 (New Source Construction); 326 IAC 2-7 (Emission Caps); and 326 IAC 2-7-20 (Operational Flexibility). Specifically, Anchor Glass requests that conditions D.1.1 and D.1.2 state a combined pull rate limit for the two furnaces based on a bubbled emission limit of 90.8 tons per year as drafted in the August 1, 1997 Indiana Register. Therefore, furnace specific annual limits for PM and SO₂ may not be appropriate. We request that the revised limits be incorporated into the final permit. Otherwise, IDEM needs to indicate when these limits will be finalized and what the mechanism will be for incorporating these requested changes.

Anchor Glass requests that the permit explicitly state that Anchor Glass can make any changes so long as emissions are not increased greater than 5 tons per year or 10 tons per year beyond the bubbled furnaces emissions cap, as appropriate. Such changes could include designing and installing a larger furnace, replacing a unit with a new furnace, or adding one or more new furnaces in addition to the two existing furnaces. Under these scenarios, no permit application would be required, but Anchor Glass would provide advance notification to IDEM. At the appropriate emissions increase level, a minor permit revision would be needed. For the appropriate emissions increases, a major permit revision will be required. When emissions increases are expected to accompany a change, a stack test would be required.

Response #6

Pursuant to 326 IAC 6-1-8.1 (Nonattainment Area Particulate Limitations) and 326 IAC 7-4 (Sulfur Dioxide Emission Limitations) each furnace has its own separate PM limit and its own separate SO₂ limit. Pursuant to these rules and pursuant to this permit, these emission limits cannot be bubbled unless a rule change is made. Anchor Glass must request a rule change. After the rule is changed, then the permit can be amended to accurately reflect the newly changed rule.

As explained in Paul Dubenetzky's letter to Bob Metzger dated May 28, 1998, the permit will not explicitly state that Anchor Glass can make the suggested changes (i.e. designing and installing a larger furnace, replacing a unit with a new furnace, or adding one or more new furnaces in addition to the two existing furnaces) because the changes suggested would require a major modification to the Title V permit. If such changes are to occur at Anchor Glass, a permit application would be required so that the OAM could review the proposed change and issue the proper permit and/or permit modification.

Section A

Comment #7

In A.2(1), A.2(2), and in the Facility Description boxes in Sections D.1 and D.2 the word "design" should replace the word "melt" and the capacities should be expressed as tons of glass per day.

Response #7

These changes have been made.

Comment #8

In A.2(3) and A.2(5) a capacity is not appropriate because this is a storage process.

Response #8

The OAM must list capacities for each emission unit. Emission estimates are based on these capacities and rule applicability is based on the emission estimates. The permit notes the capacities so that it is clear that rule applicability was based on these capacities and corresponding potential emissions.

Comment #9

The permit for the Winchester Plant lists a cardboard baler; however, this permit does not list a cardboard baler. To ensure consistency please either add the baler to this permit or delete the baler from the Winchester Plant's permit.

Response #9

The cardboard baler has been added to the permit.

Comment #10

The facility has six, not four, parts washing stations.

Response #10

This change has been made in Section A.3 of the permit and also in the appropriate Section D of the permit.

Section B

Comment #11

In reference to condition B.9, Anchor Glass does not agree that all permit noncompliances, such as missing one daily visible emissions notation, is a violation of the Clean Air Act warranting enforcement action, permit termination, or the like. Permit conditions related to surrogate monitoring parameters (such as visible emissions notations, pressure drop, and baghouse integrity) should be modified to allow a certain number of missed measurements within a specified time period. An exceedance of this requirement would be a noncompliance under Section B.9.

Response #11

Condition B.16(b)(4) allows for 5% of missed records, etc. Beyond that, failure to perform required compliance monitoring constitutes a violation of the permit requirement, which is a violation of the Clean Air Act, and does allow the OAM to pursue enforcement actions.

Comment #12

In Condition B.21 (Operational Flexibility) Anchor Glass requests that the full language of 326 IAC 2-7-20 be incorporated as proposed. The current wording of B.21 is somewhat confusing and gives the general appearance of being more restrictive than the regulations allow.

Response #12

Condition B.21 attempts to summarize and clarify the requirements of 326 IAC 2-7-20. No changes have been made as a result of this comment.

Comment #13

In reference to condition C.2 which lists an emission limit pursuant to 326 IAC 6-3-2 for processes with process weight rates less than 100 pounds per hour, which specific processes at Anchor Glass are covered under this requirement? Otherwise, why include this as an applicable requirement?

Response #13

All particulate emitting processes which have a process weight rate of less than 100 pounds per hour must comply with this requirement. This is listed as an applicable requirement in order to clarify that the PM emission limit pursuant to 326 IAC 6-3-2 (Process Operations) cannot be lower than the limit specified for a process with a 100 pounds per hour process weight rate. The OAM cannot specifically list all the facilities at Anchor Glass which must comply with this specific limit because the OAM does not request process weight rates for insignificant activities.

Comment #14

In reference to condition C.14, Anchor Glass does not believe that these high performance pressure gauges are available at a reasonable cost. We request that an alternate performance specification be required.

Response #14

As explained in the response to Comment #25, the OAM believes that monitoring the pressure drop across the baghouses is important for determining the proper operation of the baghouse. In order to accurately measure the pressure drop, adequate pressure drop gauges must be used.

Comment #15

Conditions D.1.1 and D.2.1 should limit the "pull rate" of the furnaces, not the "throughput to the furnaces." Anchor would also suggest reporting the "pull rate" of the furnaces, instead of the "charge rates."

Response #15

Now that Anchor Glass has completed a stack test, showing that the applicable emission factor is significantly lower than 1.0 pound per ton of glass produced, there is no need to put a production limit in the permit. The PM emission limit is 1.0 pound per ton of glass **produced**. Therefore, the permit must require that Anchor Glass keep records of the tons of glass **produced**. The tons of glass produced multiplied by the emission factor established by the most recent OAM approved stack test, will determine the compliance of the furnace with the yearly emission limit pursuant to 326 IAC 6-1-8.1.

Comment #16

Condition D.1.2 needs to state that fuel oil #4 can also be used.

Response #16

This condition has been changed to state the limit for both fuel oil #2 and fuel oil #4. The same limit applies for both fuel oil types.

Comment #17

Sulfur dioxide emissions from the glass melting furnaces result from two separate physical actions; the combustion of fuel oil and the melting of raw materials such as sand and limestone. The emissions from both actions are ducted to a common stack. The SO₂ emission limits in pounds per million Btu of heat input stated in D.1.2, D.1.3, D.2.2 and D.2.3 do not take into account the emissions from the melting process. Therefore, we request that the lb/MMBtu limits for the furnaces be removed from the permit.

Response #17

The lb/MMBtu SO₂ limits stated in D.1.2, D.1.3, D.2.2, and D.2.3 are only applicable to the SO₂ emissions resulting from the combustion of fuel oil. The OAM understands that the SO₂ emissions from the furnace stack are from both the combustion of fuel oil and the process of melting raw materials. The OAM proposed to determine compliance with this limit by requiring fuel oil sampling and analysis and by the record keeping and reporting requirements contained in 326 IAC 7-2. The requirements to stack test the furnaces for SO₂ emissions has been deleted.

Comment #18

In reference to D.1.7, since fuel oil is generally not used in the furnaces, one alternative for demonstrating compliance should be to certify that fuel oil was not used during the relevant time period.

Response #18

The OAM agrees. Condition D.1.10 has been changed to the following (additions are shown as highlighted):

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2 and D.1.3 **in any compliance period when fuel oil was combusted, and the natural gas fired boiler certification**, shall be submitted to the address listed in Condition C.22 - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

Comment #19

In reference to all the requirements to perform visible emissions notations, Anchor Glass requests that the following wording be employed "normal daylight operations, climatic conditions allowing." Our interpretation is that "normal daylight" refers to business hours, but does not account for inclement weather that may preclude visible emissions notations.

Please clarify what level of "training" is acceptable, i.e., by whom (internal vs. external), duration of training, etc. Perhaps the word "trained" could be replaced with "experienced." Since a certified opacity reader will not be required and observations will be merely qualitative, please specify this explicitly, such as "This experienced employee need not be, or be trained by, a certified opacity reader."

Response #19

The source should be able to perform visible emissions notations each day of operation of the facility. Since Method 9 opacity readings are not required, the observer should be able to determine whether the visible emissions are “normal” or “abnormal” regardless of the weather.

As the condition states, a trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. This training does not need to include the training to become a certified opacity reader nor does the training need to be done by a certified opacity reader. The purpose of specifying that a “trained employee” perform the visible emissions notations is to make sure that the employee would know the difference between “normal” and “abnormal” visible emissions from the particular process. The OAM believes that the definition of a “trained employee” is clear in the permit; therefore, no changes have been made to the permit in response to this comment.

Comment #20

In reference to D.1.9 and D.2.9, how shall “equivalent sulfur dioxide emissions in pounds per million Btu” be calculated? What is the purpose of this requirement?

Response #20

The purpose of this requirement is to comply with 326 IAC 7-2, and to show compliance with 326 IAC 7-1 and 326 IAC 7-4. To calculate the SO₂ emissions in pounds per million Btu from one of the furnaces, use the following equation:

$$157S^* \times \text{fuel oil usage (kgallons)} / \text{maximum heat input capacity of the furnace (MMBtu/hr)}$$

where S = sulfur content of the fuel oil

*from AP42, fifth edition, Chapter 1, Table 1.3-1

Comment #21

Conditions D.1.9(a)(5) and (6) and D.2.9(a)(5) and (6) should always reference “fuel oil,” not simply “fuel.”

Response #21

The requested changes have been made.

Comment #22

How is the process weight limit to be applied to the storage process?

Response #22

The process weight limit would be calculated based on the weight of materials located in the storage area in any given hour.

Comment #23

Condition D.3.6 states that "A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter." Please clarify the expression "redirecting the vents." Anchor Glass does not have operations that would necessitate bypassing the existing control equipment and venting directly to the atmosphere.

Response #23

Sometimes facilities have the capability of venting the emissions from their baghouse either inside the plant or outside to the atmosphere. This condition would require a baghouse inspection whenever the facility would switch the baghouse emissions from venting inside the plant to venting outside to the atmosphere.

Comment #24

Condition D.3.7 states requirements for when there is a broken bag or failure detection. Please clarify how Anchor Glass may comply with this requirement if there is only one compartment.

Response #24

The condition specifically states what is required for baghouses with only one compartment. The condition states:

"For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced."

Comment #25

The requirements to inspect the baghouses on a quarterly basis and to record differential pressure drops across the baghouses are duplicative with the requirement to perform daily visible emission notations. The baghouses are routinely inspected as part of the facility's preventive maintenance plan. In reality, the measurement of pressure drop is a response step should visible inspection indicate abnormal conditions. Anchor Glass requests that these conditions and their associated record keeping requirements be deleted from the permit.

Response #25

IDEM agrees that some bag failures are immediately detected through visible emission observations; however, the degree of bag failure may cause slow deterioration of the overall performance of the unit; in which case a baghouse inspection would be necessary to identify the problem.

Monitoring of the static pressure drop can alert the operator to relative changes (such as dust cake resistance) over a period of time. The operator can use this information to chart trends and determine if the unit is operating within the optimal range as determined by baseline testing of the unit and manufacturer's specifications. Pressure drop is an indicator of a variety of conditions within the baghouse. Any deviations from the normal operational range of the unit, whether gradual or sudden, should alert the operator that the unit needs maintenance. The Compliance Response Plan should include response steps to anticipate corrective actions when abnormal conditions arise. Both gradual and sudden changes in the pressure drop could result in damage to the bags or baghouse if not properly addressed.

Comment #26

In reference to conditions D.3.1, D.4.1, D.5.1, and D.6.1, it appears that two separate emission limits are being applied to this emission unit - a grain standard and a process weight limit. Since all four batch house emission units have similar configuration (controlled and uncontrolled points), all four should be subject to the same single type of emission limit.

Response #26

The OAM has listed the requirements of these four separate emission units in four separate D Sections for clarification purposes. Rule 326 IAC 6-1 (Nonattainment Area Particulate Limitations) applies to sources or facilities which have the potential to emit one hundred (100) tons or more of particulate matter per year or have actual emissions of ten (10) tons or more of particulate matter per year. Therefore, each of these units is subject to 326 IAC 6-1, instead of 326 IAC 6-3-2 (Process Operations). This change has been made in the permit.

Comment #27

The facility description in Section D.6 does not contain a capacity.

Response #27

The capacity listed in Section A of the permit has now also been included in Section D.6 of the permit.

Comment #28

The cullet crushing operation, the mold swabbing operation, and the hot end treatment process are sources of fugitive emissions. Therefore, Anchor Glass has no means of demonstrating compliance with 326 IAC 6-3-2. Therefore, these requirements should be deleted from the permit. Alternatively, we request that this permit condition be modified to indicate that compliance is presumptive provided that no visible emissions are observed. In this case, the media of which "P" is composed needs to be defined.

Response #28

As stated in response #26, these facilities are subject to 326 IAC 6-1, not 326 IAC 6-3-2 (Process Operations). The rule 326 IAC 6-1 applies to all PM emitting processes in a nonattainment area, regardless of whether the emissions are fugitive or nonfugitive. This permit does not require Anchor Glass to demonstrate compliance with this requirement.

Comment #29

How must the facility record visible emissions notations? Must these deviations be reported, and if so, using which form?

Response #29

Records must be kept of the results of visible emission notations. The records should state whether emissions from each stack were "normal" or "abnormal" each day. Reporting of visible emission notations is not required. A form for documenting the results of visible emission notations has not been included with the permit. By not including a form with the permit, OAM is allowing Anchor Glass to develop and use one that is source specific.

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

Permit Section A

1. The rule cites which make the insignificant activities “specifically regulated” are now listed in Section A.3 of the permit after each insignificant activity.

Permit Section B

2. Condition B.10 Certification now also includes the rule cite 326 IAC 2-7-5(3)(C).
3. Regarding Condition B.11 (Annual Compliance Certification), the OAM has decided that although we have the authority, it may be cumbersome for the source to list all insignificant activities in the annual compliance certification, so the requirement is being deleted from the permit.

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); **and**
 - ~~(5) Any insignificant activity that has been added without a permit revision; and~~
 - ~~(6)~~**(5)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

4. Condition B.12 (Preventive Maintenance Plan) paragraphs (b) and (c) have been revised as follows:

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that ~~lack of proper maintenance~~ **failure to implement the Preventive Maintenance Plan** does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. **IDEM, OAM may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.**

5. Condition B.14 (Permit Shield) condition has been revised to clarify how the permit shield affects applicable requirements from previous permits and how the permit shield affects determinations that a specific requirement is not applicable to the source. Paragraph (d) has been revised to clarify the intent of the condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) ~~The provisions of this permit take precedence over previous conditions related to an applicable requirement established by a previously issued permit.~~ **This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.** Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. **Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.**
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section

114 of the Clean Air Act.

- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
 - (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
 - (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]
6. B.16 (Deviations from Permit Requirements and Conditions) paragraph (b)(3) has been revised to be consistent with B.12.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless ~~lack of maintenance~~ **such failure** has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.
7. B.21 (Changes Under Section 502(b)(10) of the Clean Air Act) has been deleted and B.22(b) (Operational Flexibility) has been revised as follows. Both conditions refer to the same rule and it makes more sense for them to be combined.

~~B.21~~ ~~Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]~~

~~The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:~~

- ~~(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.~~
- ~~(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).~~

B.22 Operational Flexibility [326 IAC 2-7-20]

- ~~(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written~~

notification shall include the following:

- (b) **The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:**
- (1) **The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).**
 - (2) **For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:**
 - ~~(1)~~(i) A brief description of the change within the source;
 - ~~(2)~~(ii) The date on which the change will occur;
 - ~~(3)~~(iii) Any change in emissions; and
 - ~~(4)~~(iv) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

8. B.22 (re-numbered B.21)(Operational Flexibility) replace 326 IAC 2-1 with 326 IAC 2-1.1 in B.22(a)(2).

B.21 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC ~~2-1~~ **2-1.1** has been obtained;

9. B.23 (re-numbered B.22)(Construction Permit Requirement) the referenced statute has been repealed therefore this condition has been revised.

B.22 Construction Permit Requirement [326 IAC 2]

~~Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, A~~
modification, construction, or reconstruction shall be approved ~~as if~~ required by and in accordance with **the applicable provisions of 326 IAC 2.**

10. B.24 (re-numbered as B.23)(Inspection and Entry) in order to clarify confidentiality B.24 has been revised. OAM also determined that subpart (1) and (2) of paragraph (e) were unnecessary, therefore they have been deleted.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be

required by law, **and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such**, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

(1) ~~The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]~~

(2) ~~The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]~~

11. B.26 (re-numbered as B.25)(Annual Fee Payment) (b) has been revised.

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (b) **Failure Except as provided in 326 IAC 2-7-19(e), failure** to pay may result in administrative enforcement action or revocation of this permit.

12. B.27 (re-numbered as B.26)(Advanced Source Modification Approval) has been replaced with a new condition which reflects the current rules.

~~B.27 Enhanced New Source Review [326 IAC 2]~~

~~The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any~~

~~previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.~~

B.26 Advanced Source Modification Approval [326 IAC 2-7-5(16)]

The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 if such modifications occur only during the term of this permit.

13. The IDEM now believes that condition B.27 regarding the use of credible evidence is not necessary and has removed it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit.

~~**B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]**~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non-compliance.~~

Permit Section C

14. Condition C.1 which stated that the source was an existing major source has been deleted from the permit. The OAM believes that this source is an existing major source as indicated in Section A.1; however, it is not necessary that this be a permit condition. All other conditions in Section C of the permit have been re-numbered accordingly.
15. Condition C.3 (now renumbered as C.2) has been reworded to reflect recent rule changes. Changes to the condition are shown as follows (deletions are shown as strikeouts and additions are shown in bold):

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of thirty percent (30%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~ **any one (1) six (6) minute averaging period**, as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor** in a six (6) hour period.

16. C.4(Incineration) has been revised to say that 326 IAC 9-1-2 is not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. **The provisions of 326 IAC 9-1-2 are not federally enforceable.**

17. C.6(Operation of Equipment) has been revised since there may be control devices that are not required to be used to assure compliance with emission limitations.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

18. The following condition has been added to the permit.

C.7 **Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

19. C.8(Asbestos Abatement Projects) paragraph (e) has been revised to more accurately reflect the rule.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (e) Procedures for Asbestos Emission Control

The Permittee shall comply with the **applicable** emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are ~~mandatory~~ **applicable** for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

20. C.9 (Performance Testing) has been revised to specify the locations of applicable procedures and analysis methods for performance testing.

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing ~~methods~~ **any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures** approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the

completion of the testing. An extension may be granted by the ~~Commissioner~~ **IDEM, OAM**, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

21. C.11 (Compliance Monitoring) has been revised to clarify when compliance monitoring must begin.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. **All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.** The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment ~~no more than ninety (90) days after receipt of this permit.~~ If due to circumstances beyond its control, ~~this schedule cannot be met~~ **that equipment cannot be installed and operated within ninety (90) days**, the Permittee may extend the compliance schedule **related to the equipment for** an additional ninety (90) days provided the Permittee notifies:

22. C.14 (Monitoring Methods) has been revised to clarify that the monitoring and testing requirement are located in Section D of the permit.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing **required by Section D** ~~performed to meet the applicable requirements~~ of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

23. C.21 (General Record Keeping Requirements) (c)(4) has been modified to match B.12.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(c) Support information shall include, where applicable:

- (1) Copies of all reports required by this permit;
- (2) All original strip chart recordings for continuous monitoring instrumentation;
- (3) All calibration and maintenance records;
- (4) Records of preventive maintenance shall be sufficient to demonstrate that ~~improper maintenance~~ **failure to implement the Preventive Maintenance Plan** did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the

tasks.

Permit Section D

24. The facility description boxes have been revised to clarify that descriptive information is not federally enforceable.

Facility Description [326 IAC 2-7-5(15)] : facility description
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

25. The word “days” was inadvertently left out of condition D.1.6. The revised condition is as follows:

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period between 30 and 36 months after issuance of this permit or within 180 **days** after startup, whichever is later, the Permittee shall perform PM testing using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.1.1. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

26. Conditions D.1.7 and D.2.7 have been revised to also include the requirement to demonstrate that the sulfur content of the number 6 fuel oil does not exceed 1.28%. The revised condition is as follows:

D.1.7 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the **#2** fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight **and that the #6 fuel oil sulfur content does not exceed 1.28% by weight** by:
- (1) Providing vendor analysis of fuel delivered, if accompanied by a certification;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the furnace, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above

shall not be refuted by evidence of compliance pursuant to the other method.

27. D.3.4, D.4.4, D.5.4, and D.6.4 (Baghouse) have been revised to clarify for which facilities the controls are required. As an example, revised condition D.3.4 is shown below:

D.3.4 Baghouses [326 IAC 2-7-6(1)]

The baghouses ST6, ST7, ST8, and ST9 shall be in operation **and control emissions from the batch storage process** at all times that the batch storage process is in operation, in order to comply with the limit in condition D.3.1.

28. Conditions D.3.7, D.4.7, D.5.7, and D.6.7 have been modified. The new conditions are reformatted to lessen the confusion between multi- and single compartment baghouses. Language has also been added to clarify that the emergency provisions of the Title V rule and general permit condition may take precedence if applicable.

D.3.7 Broken or Failed Bag or Failure Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.~~ **Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (b) ~~Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.~~ **For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

Reporting Forms

29. Emergency/Deviation Occurrence Report the rule cite 326 IAC 2-7-5(3)(c) should have been a capital C, 326 IAC 2-7-5(3)(C).

Check either No. 1 or No.2

- | | | |
|---|----|---|
| 9 | 1. | This is an emergency as defined in 326 IAC 2-7-1(12) |
| | C | The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and |
| | C | The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16 |
| 9 | 2. | This is a deviation, reportable per 326 IAC 2-7-5(3)(c) 326 IAC 2-7-5(3)(C) |
| | C | The Permittee must submit notice in writing within ten (10) calendar days |

Technical Support Document (TSD)

30. The technical support document stated an opacity limit of forty percent (40%). This opacity limit is incorrect because the source is located in Dearborn County, which has an opacity limit of thirty percent (30%). The draft permit correctly stated the thirty percent (30%) opacity limit.

On July 31, 1998 upon further review of the revised Part 70 permit, Plews Shadley Racher & Braun submitted additional comments on behalf of Anchor Glass Container Corporation. A summary of these comments is as follows:

Comment #30

The responsible official should be Gordon M. Stewart, Vice President of Engineering.

Response #30

This change has been made.

Comment #31

The word cardboard is misspelled in Section A.3(6).

Response #31

This has been corrected.

Comment #32

Section B.16(b)(4) specifically states that "failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter" would not be a deviation from the permit requirements and conditions. It follows that an event or activity which is not a deviation would also not be considered noncompliance with this permit nor a violation of the Clean Air Act under Section B.9. Anchor Glass requests that it be clearly stated in Section B.9 that an event or activity which has been excluded from being considered a deviation under Section B.16(b) would not be an event of noncompliance nor a violation of the Clean Air Act.

Response #32

Condition B.9 has been changed as follows:

B.9	Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
(a)	The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, or those specifically listed in B.16(b) (Deviations from Permit Requirements and Conditions) , constitutes a violation of the Clean Air Act and is grounds for: <ul style="list-style-type: none">(1) Enforcement action;(2) Permit termination, revocation and reissuance, or modification; or(3) Denial of a permit renewal application.
(b)	It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

Comment #33

Condition B.11 should state that the time period for coverage of the initial annual compliance certification report should cover only from the date of final permit issuance through December 31 of the same year. Also, because the annual compliance certification report must include "the identification of each term or condition of this permit that is the basis of the certification," it is requested that IDEM clarify which specific terms and conditions "including emission limitations, standards, or work practices," are necessary to submit a complete compliance certification report. Specifically, Anchor Glass requests that IDEM clarify whether the annual compliance certification report is limited to those terms and conditions stated in the Section D Facility Operation Conditions.

Response #33

Both IDEM and EPA have acknowledged that the identification of terms and conditions for certification purposes may be accomplished by cross-referencing the Permit or previous reports. This enables the source to minimize the length of their compliance certifications by incorporating the Permit and other documents by reference. Non-Rule Policy Document Air-007 (copy enclosed) allows cross-referencing to be used in FESOP annual certifications and will be modified to include Title V annual compliance certifications. The annual compliance certifications should cross-reference the conditions in Sections C and D of the permit.

Comment #34

Anchor Glass requests clarification of the meaning of the phrase "in operation" in C.6, D.3.4, D.4.4, D.5.4, and D.6.4. *All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.* There are times that equipment may be in an idling mode during which processing is not actively occurring. Anchor Glass believes that periods of idling should not be considered as to be "in operation." This would enable Anchor Glass to conduct maintenance on control equipment during periods of process equipment idling. Anchor Glass requests that the following sentence be inserted with each identified section: *The phrase "in operation" does not include periods of equipment idling.*

Response #34

It has been determined that while some emission units will require control devices, it is possible that some of the processes for an emission unit may not require the use of the control device to maintain compliance with emission limitations. Therefore, new language has been added to Condition C.6 in order to include a provision for these exceptions.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

Comment #35

To the extent that the compliance monitoring requirements included in this draft Part 70 Operating Permit are based on an unpromulgated guidance document that is being applied as if it were law and to the extent the requirements are in addition to or differing in terms of applicability or detail from the recently promulgated EPA CAM rule, IDEM is overreaching its authority and has failed to go through the proper rule making process including the opportunity for public comment. Because IDEM is requiring compliance monitoring before the EPA CAM requirements go into effect, Anchor Glass could have to revise its compliance monitoring programs developed pursuant to this draft permit once CAM applies. Furthermore, a competitive disadvantage is being created because other Midwestern states have not included excessive and detailed compliance monitoring terms in their permits. Anchor Glass requests that the compliance monitoring requirements of this draft permit be no more extensive than is contained in the EPA CAM rule.

Response #35

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each Permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each Permittee's Annual Compliance Certification. Each Permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the Permittee's Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement.

The maintenance plan was to set out the "corrective actions" that the Permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the Permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a Permittee's maintenance staff handle the routine maintenance of the equipment, and a Permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Comment #36

The last sentence of paragraph (a) of Condition C.18 Actions Related to Noncompliance Demonstrated by a Stack Test provides that "OAM reserves the authority to use enforcement activities to resolve noncompliance stack tests" after an initial stack test indicating noncompliance. Because stack testing frequently can lead to inaccurate reporting of results, it is requested that this reservation be relocated to paragraph (b), which would allow for the retest to occur prior to enforcement activities.

Response #36

The following revision will be applied to the Permittee's Title V permit.

- (a) When the results of a stack test performed in conformance with Section C -Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee also shall take appropriate action to minimize **excess** emissions from the affected facility while the response actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. ~~IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.~~
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. ~~Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.~~
- (c) **IDEM, OAM reserves the authority to take any actions allowed under law to resolve noncompliant stack tests.**

Comment #37

Paragraph C of condition C.20 *Monitoring Data Availability* should be clarified to provide as follows:

If the equipment is operating but abnormal conditions prevail, additional observations and sampling

~~should be taken~~ **may be necessary, as warranted by the Compliance Response Plan**, with a record made of the nature of the abnormality.

Response #37

Paragraph (c) requires additional observations and sampling should be taken if the equipment is operating but abnormal conditions prevail, with a record made of the nature of the abnormality. This is believed to be reasonable for the source to document whether abnormal conditions resulted in a deviation from any permit condition. There has been no change to this condition.

Comment #38

It is our understanding that IDEM has recently expanded the applicability of the PMP requirements to include the emission unit not just the control device it serves. The PMP requirement pursuant to the Clean Air Act is responsible for identifying the inspection activities and replacement parts which will ensure that compliance with the air regulations and permit limitations is achieved. The Clean Air Act does not authorize a PMP to include inspection, maintenance, and replacement parts for equipment, controls, and operations which do not affect the air emissions. Any required PMP which includes the information listed in Section B.12(a)(1)-(3) should only address the information which can actually affect potential air emissions. It is noted that some facilities or emission units (without taking into account their control devices) may not have any inspection activities or replacement part information to include in a PMP and therefore, the PMP would be blank. Anchor Glass believes that the inclusion of the raw materials batch storage, weighing and mixing, silo, and the underground conveyor processes under the PMP requirement is unnecessary since there is no preventive maintenance that could be performed on these units (not taking into account the PMP for their baghouses) which would affect air emissions or result in reduced emissions. Anchor Glass requests that the PMP requirement be omitted from the final Part 70 Permit for these processes associated with the raw materials batch house.

Response #38

The PMP requirements in Sections D.3, D.4, D.5, and D.6 are in reference to the baghouses. There have been no changes to these conditions.

Comment #39

Anchor Glass requests that the wording associated with each of the allowable grain loading limits pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Matter Limitations) be modified to include the qualifier phrase *as a running monthly average*.

Response #39

The OAM does not believe that this is the correct interpretation of the rule. The OAM believes that Anchor Glass must comply with the limit on an hourly basis, such that a stack test, if required, could show compliance or noncompliance with the limit. There have been no changes to the conditions.

Comment #40

Sections D.1 and D.2 require stack testing for the glass furnaces. Anchor Glass believes that since these emission units carry specific and ongoing stack testing requirements, the general statement of IDEM's ability to require additional compliance testing "when necessary to determine if the facility is in compliance" should be narrowed to avoid unfounded directives to perform such testing. Anchor Glass requests that the last sentence of these Section be revised as follows:

In addition to these requirements, IDEM may require compliance testing when necessary **if supported by a reasonable belief that the facility is not in compliance** ~~to determine if the facility is in compliance.~~

Response #40

IDEM has ample legal authority to require stack testing to demonstrate compliance. No changes were made as a result of this comment.

Comment #41

Anchor Glass requests that the general statements of IDEM's ability to require additional compliance testing should be narrowed to avoid unfounded directives to perform such testing. Anchor Glass specifically requests that the phrase "in writing and if supported by a reasonable belief that the facility is not in compliance" be inserted as shown. Anchor Glass also requests that the more appropriate term "grain loading" replace the reference to "PM limit" in these sections.

Response #41

IDEM has ample legal authority to require stack testing to demonstrate compliance. No changes were made as a result of this comment.

Comment #42

The draft Part 70 Operating Permit inappropriately limits Glass Furnaces #1 and #2 to PM limits below the limits stated by regulation. 326 IAC 6-1-8(e)(1) and (2) provide that the furnaces at Thatcher Glass, now known as Anchor Glass, are limited to 48.0 tons per year and 1.0 pound per ton, and 42.8 tons per year and 1.0 pound per ton, respectively. These PM emissions limitations are contained in "Appendix A" to the rules. The Appendix A limits are, however, subject to immediate modification by a permit later issued pursuant to 326 IAC 6-1-5(a), which clearly states that when a permit is issued "the emission limitations set forth in the permit shall supersede and replace the corresponding limitations in Appendix A [326 IAC 6-1-8.1]." These PM limitations by rule were final on October 1, 1980. On May 31, 1984, the Indiana Air Pollution Control Board issued Operation Permits to the Thatcher Glass Corporation which authorized an increase in PM emissions from Glass Furnaces #1 and #2. The 1984 Operation Permits authorize Anchor Glass to emit 64 tons of PM per year and 1.0 pound per ton, and 49 tons of PM per year and 1.0 pound per ton from Glass Furnaces #1 and #2 respectively. Pursuant to 326 IAC 6-1-5(a), the 1984 Operation Permits' increased PM emissions limits must "supersede and replace" the corresponding limitations in Appendix A of the rule of 326 IAC 6-1-8.1(e). The express authority by rule stipulates that the increased PM emissions limits are therefore, the enforceable PM emissions limits.

After the operation permits were issued in 1984 with the increased PM limits, the Indiana Air Pollution Control Board acknowledged that the permits' emission limits were the correct applicable, and enforceable limits for Anchor Glass Furnaces #1 and #2. In its August 31, 1984 letter to the U.S. EPA, Region V, the Board stated:

It is recommended that reclassification [of Dearborn County] to attainment be implemented as requested in my letter of February 16, 1984 [before the Operation Permits were issued] because there is no significant impact from these point source emission corrections. (Notations and emphasis added).

See attachment 1. The increased PM emissions limits contained in the May 1984 Operation Permits remain the correct, applicable, and enforceable limits for Anchor Glass' Furnaces #1 and #2.

Furthermore, the current attainment status for Dearborn County is based upon and supported by the Operation Permits limits and there is no authority to decrease those limits for attainment purposes.

Anchor Glass requests that the PM emissions limitations authorized by 326 IAC 6-1-5(a) and the 1984 Operation Permits be revised in Section D.1.1 and D.2.1 of the draft Part 70 Operating Permit as follows:

Glass Furnace #1	64 tons PM per year and 1.0 pound per ton of glass produced
Glass Furnace #2	49 tons PM per year and 1.0 pound per ton of glass produced

With respect to the PM emissions limitation per ton of glass produced, the draft Part 70 Operating Permit applied an inappropriate figure which appears to have evolved from the Anchor Glass stack testing results for Furnace #2. IDEM has apparently used the Anchor Glass stack testing result for Furnace #2 to change the regulatory limit of 1 pound per ton of glass produced to a limit of 0.67 and 0.625 (apparently an extrapolation of the stack test) pound per ton of glass produced for Furnaces #1 and #2, respectively. The stack testing was performed to demonstrate compliance with the 1 pound per ton limit. There is no requirement nor does Anchor Glass intend to be limited to the results of its stack test. Again, Anchor Glass requests that the PM limit for Sections D.1.1 and D.2.1 be revised to 1.0 pound per ton of glass produced, as in the original draft Part 70 Operating Permit, the Indiana Administrative Code, and the current operating permits.

Response #42

The permit that was issued in 1984 with the 64 and 49 tons per year limitations was accompanied by a request for a SIP revision. However, the SIP revision was never approved; therefore, the permit is invalid because it does not follow the requirements of 326 IAC 6-1-7 (Nonattainment Area Particulate Limitations).

The limits 0.625 and 0.67 pound of PM per ton of glass produced for Furnaces #1 and #2 respectively, were placed in the draft permit so that a production limit would not be necessary to comply with the yearly limits of 48.0 and 42.8 tons per year, respectively. However, the OAM has replaced the limits 0.625 and 0.67 pounds of PM per ton of glass produced with the limit 1.0 pound per ton of glass produced, which is the limit required by 326 IAC 6-1-8.1. Anchor Glass will now need to report their production of glass and use the emission factor from the most recent stack test in order to calculate their emissions and show compliance with the yearly emission limits.

Comment #43

Anchor Glass requests that the conditions in Sections D.1 and D.2 be clarified to specifically state that there is no permit limit on the sulfur contents of the numbers 2, 4, and 6 fuel oils. The only permit limit concerning sulfur dioxide for Furnaces #1 and #2 is the stated SO₂ emissions limits. To that regard, the last sentence of Conditions D.1.2, D.1.3, D.2.2, and D.2.3 should be deleted in their entirety.

The appropriate sections for discussion of the appropriate sulfur contents to demonstrate compliance with the SO₂ emissions limits for the fuel oils are in Conditions D.1.7(a) and D.2.7(a). First, the condition headings for D.1.7 and D.2.7 should be revised to exclude the words "and Sulfur Content" since the only Compliance Determination Requirements is for "Sulfur Dioxide Emissions." Second, paragraph (a) of Conditions D.1.7 and D.2.7 should be revised to allow a demonstration of the "average" sulfur content of these fuel oils and to clarify that the Permittee need only make the compliance demonstration provided in subparagraph (1) **OR** (2), as follows:

Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the #2 fuel oil sulfur content does not exceed **an average** five-tenths percent by weight and that the #6 fuel oil sulfur content does not exceed **an average** 1.28% by weight by:

(1)...

OR

(2)...

Response #43

For fuel oil combustion, sulfur dioxide emissions are a function of the sulfur content of the fuel oil that is combusted. For distillate fuel oil combustion, the rule limits SO₂ emissions to 0.5 pounds per million Btu. This is equivalent to a fuel oil sulfur content of 0.5%. For #6 fuel oil combustion, the rule limits SO₂ emissions to 1.4 pounds per million Btu. This is equivalent to a fuel oil sulfur content of 0.5%. The OAM does not believe that the condition should be changed to allow a demonstration of the "average" sulfur content of the fuel oils. There have been no changes to these conditions as a result of this comment.

Comment #44

Anchor Glass requests that an umbrella be placed over the particulate matter emissions from Furnace #2 and the raw materials batch house (including storage, weighing and mixing, silo and underground conveyor) because these operations are a single production line. It is our understanding that an umbrella could be applied to these operations which would result in a single PM emission limit which combines the 42.8 tons per year PM limit from Furnace #2 and the allowable PM emissions from the raw materials batch house. We also request that there be no modifications to the testing requirements for each of these facilities such that only Furnace #2 would be required to perform PM testing once every 5 years. Anchor Glass believes that the Compliance Determination requirements already provided for the raw materials batch house (i.e. visible emissions notations and baghouse inspections) would continue to effectively and thoroughly demonstrate compliance with the PM limits on these processes. Anchor Glass requests that revisions to the draft permit consistent with said umbrella be incorporated in the TSD as well.

Response #44

The OAM does not agree to place an "umbrella" limit over Furnace #2 and the raw materials batch house. Furnace #2 is limited separately by 326 IAC 6-1-8.1 (Nonattainment Area Particulate Limitations) and therefore, must have its own limit in the permit. Also, if all the limits were combined, it would be impossible to determine compliance by way of a stack test unless all of the operations were stack tested at the same time. There have been no changes to the permit as a result of this comment.

Comment #45

Conditions D.1.10 and D.2.10 require submittal of a quarterly summary of information to document compliance with the PM and SO₂ emission limits of Conditions D.1.1, D.1.2, D.1.3, D.2.1, D.2.2, and D.2.3. However, the quarterly reporting form at page 59 refers inappropriately to throughput limits for Furnaces #1 and #2. IDEM's insertion of throughput limits on the furnaces is unsupported by regulation and the compliance requirements and exceeds the scope of other Part 70 Operating Permits. Anchor Glass requests that the reporting form be revised to present a table for inclusion of the actual PM emissions for the furnaces each quarter.

Response #45

The quarterly report form has been revised such that an equation is now used to calculate the yearly emissions from the furnaces, using the actual production of glass and the emission factor from the most recent OAM approved stack test.

Comment #46

Anchor Glass requests that Condition 2.10 be revised as was Condition 1.10 with the additional phrase "in any compliance period when fuel oil was combusted, and/or the natural gas fired boiler certification." This revision was previously noted in response to comment #18.

Response #46

The OAM agrees. The requested change has been made.

Comment #47

The requirement to perform both visible emission notations and parametric monitoring for the raw materials batch house (including storage, weighing and mixing, silo, and underground conveyor) is overly burdensome and not calculated to provide any additional assurances of continuous compliance. One requirement alone would adequately assure continuous compliance with the applicable grain loading limitation, especially given that emissions are controlled by baghouses for each facet of the production line, the baghouses are inspected quarterly, and a Preventive Maintenance Plan will require maintenance activities and replacement parts for these baghouses to ensure continued Operation. In addition, Anchor Glass does not believe that the high performance pressure gauges required for parametric monitoring are available at a reasonable cost relative to these emission units. Anchor Glass requests that the parametric monitoring requirements and record keeping requirements of the raw materials batch house be removed from this permit.

Response #47

These comments have been addressed in responses #14 and #25.

Comment #48

In the event that parametric monitoring is retained in this permit, Anchor Glass requests that (1)(B) and (2)-(8) of Conditions D.3.9(b), D.4.9(b), D.5.9(b), and D.6.9(b) be removed in their entirety because maintenance of these items is not applicable or relevant to documenting compliance with the Parametric Monitoring Conditions D.3.8, D.4.8, D.5.8, and D.6.8. The requirement to maintain these specific details in association with Parametric Monitoring is irrelevant, unreasonable, unsupported by regulation, and far exceeds the scope of other Part 70 operating permits. Quality Assurance and Quality control procedures are not defined anywhere in the permit or in the rules and these words have very different meaning in the industrial world than in the regulatory world. Anchor Glass believes that the only possible QC procedure related to parametric monitoring is the semi-annual calibration of the pressure drop instruments and this is already required by the sections providing for parametric monitoring. Paragraphs (2) and (7) are redundant with the requirements of the Compliance Response Plan. Paragraph (3) is redundant with the PMP; and paragraph (8) is redundant with paragraph (c) of the record keeping requirements. Also, paragraph (c) of Condition D.4.9 is misnumbered and should be corrected to paragraph (b).

Response #48

Condition D.3.9 (b)(2) requires documentation of all response steps implemented, per event. This would include anything that was done in response to an out of range reading, such as an out of range pressure drop reading or observation of abnormal visible emissions.

Condition D.3.9(b)(3) requires that Operation and Compliance Response logs, including work purchase orders shall be maintained. This includes proof that such a response was actually taken, such as a purchase order for a new baghouse part to replace a broken one observed during a baghouse inspection in response to observing abnormal visible emissions.

Condition D.3.9(b)(4) requires maintaining Quality Assurance/quality Control (QA/QC) procedures. This is in reference to pressure gauges or other equipment used in complying with compliance monitoring requirements. For example, the Permittee should maintain a record of the procedures used to calibrate the pressure gauges used to read the differential static pressure across the baghouses.

Condition D.3.9(b)(7) requires maintaining an equipment “troubleshooting” contingency plan. This is documentation of the Compliance Response Plan, which states what the Permittee will do in cases where compliance monitoring indicates a potential problem or abnormal situation. For example, this plan would state what action should be taken if the pressure drop reading is above the indicated range.

Condition B.12 requires the Permittee to prepare and maintain a Preventive Maintenance Plan (PMP). It does not specifically state what the PMP should include for specific control devices. The OAM agrees that it is likely that some of the requirements of Condition D.3.9(b) will be contained in the PMP; however the OAM does not review the PMP for each source. The requirements of condition D.3.9(b) help to ensure that even if the PMP is inadequate, necessary maintenance will be performed on the baghouse and documented accordingly. No changes have been made to the permit as a result of this comment.

Comment #49

Regarding the conditions titled Broken or Failed Bag Detection, failure modes in control equipment vary as to type and severity. Failure may occur in baghouse/cartridge filter control equipment which does not necessarily result in reduction in ability of the control equipment to control emissions. For example, in baghouse and cartridge filter collectors, alarms, fan starters, air flow meters, solenoids, timers, and pulse valves may be repaired without shutting down the baghouse and/or cartridge filter collector. Anchor Glass requests that the following changes be made:

- (a) The affected compartments **which cannot be repaired without shutting down the unit**, will be shut down immediately...
- (b) For single compartment baghouses **or collectors, failed units which cannot be repaired without shutting down the collector**, will be shut down immediately...

Response #49

The condition states “In the event that **bag failure** has been observed...” The OAM believes that bag failure would be defined as a failure which would result in the reduction in ability of the control equipment to control emissions. No changes have been made to the permit as a result of this comment.

Comment #50

Anchor Glass has made several comments requesting changes to the TSD.

Response #50

No changes will be made to the TSD after the public notice period. The TSD remains unchanged and the TSD addendum notes any changes made to the permit after the public notice period.

Comment #51

Anchor Glass wishes to further clarify its original comment #4. If Anchor Glass were to replace a raw materials baghouse with a baghouse which meets or exceeds the existing baghouse control efficiency, such that there would be no potential increase in emissions, we request confirmation that neither a minor nor significant modification would be required. At most, Anchor Glass could submit a notification letter to IDEM of the replacement pursuant to 326 IAC 2-7-12. The present IDEM response #4 in the TSD addendum is contrary to the current representations of the IDEM Permit and Rules Sections and Anchor Glass requests that it be revised.

Response #51

Comment #4 was made and responded to before article 2 of the current rules was revised. It was correct at the time it was made and will therefore, not be revised.

Pursuant to the newly revised Article 2 rules, the OAM believes that the replacement of a baghouse with a new baghouse which meets or exceeds the existing baghouse control efficiency would not require a minor nor significant modification, as long as no other changes were made to the process.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Anchor Glass Container Corporation
Source Location: 200 West Belleview Drive, Lawrenceburg, Indiana 47025
County: Dearborn
SIC Code: 3221
Operation Permit No.: T 029-6043-00007
Permit Reviewer: Nisha Sizemore

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Anchor Glass Container Corporation relating to the operation of a glass container manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) one (1) natural gas, propane, or numbers 2, 4, or 6 fuel oil-fired glass furnace, identified as furnace #1, constructed in 1951, with a maximum melt capacity of 421 tons per day, with emissions uncontrolled and exhausting to stack ST1;
- (2) one (1) natural gas, propane, or numbers 2, 4, or 6 fuel oil-fired glass furnace, identified as furnace #2, constructed in 1959, with a maximum design melt capacity of 350 tons per day, with emissions uncontrolled and exhausting to stack ST2;
- (3) one (1) raw materials batch storage process, constructed in 1951, with a maximum capacity of 1000 tons per day, with emissions controlled by baghouses ST6, ST7, ST8, and ST9;
- (4) one (1) raw materials batch weighing and mixing process, constructed in 1951, with a maximum capacity of 1000 tons per day, with emissions controlled by baghouses ST10, ST11, and ST12;
- (5) one (1) raw materials batch silo, constructed in 1951, with a maximum capacity of 1000 tons per day, with emissions controlled by baghouses ST4 and ST5; and
- (6) one (1) underground conveyor, constructed in 1951, with a maximum capacity of 1000 tons per day, controlled by a baghouse ST3.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Requiring ENSR

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) cullet crushing operation;
- (2) one (1) cardboard shredder / baler;
- (3) mold swabbing operations, including multiple forming machines;
- (4) hot end treatment process;
- (5) one (1) bottle internal treatment operation;
- (6) eight (8) natural gas-fired annealing lehrs;
- (7) cold end container coating operation including multiple spray coaters;
- (8) one (1) video jet printing system;
- (9) four (4) parts washing station used for maintenance purposes;
- (10) mold shop operations;
- (11) storage tanks emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of VOC;
- (12) natural gas-fired combustion sources with heat input equal to or less than ten million Btu per hour;
- (13) equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour;
- (14) a gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (15) a petroleum fuel, other than gasoline, having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (16) storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
- (17) vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (18) refractory storage not requiring air pollution control equipment;
- (19) filling drums, pails or other packaging containers with lubricating oils, waxes, and greases;

- (20) application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
- (21) Cleaners and solvents having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C or having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees C; the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (22) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (23) closed loop heating and cooling systems;
- (24) activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume;
- (25) any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs;
- (26) water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs;
- (27) forced and induced draft cooling tower system not regulated under a NESHAP;
- (28) replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (29) heat exchanger cleaning and repair;
- (30) paved and unpaved roads and parking lots with public access;
- (31) covered conveyors for limestone conveying of less than or equal to 7,200 tons per day for sources other than mineral processing plants constructed after August 31, 1983;
- (32) underground conveyors;
- (33) asbestos abatement projects regulated by 326 IAC 14-10;
- (34) equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment;
- (35) blowdown for any of the following: sight glass, boiler, compressors, pumps and cooling tower;
- (36) diesel generators not exceeding 1600 horsepower;
- (37) stationary fire pumps;
- (38) grinding and machining operations;
- (39) mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C; and
- (40) a laboratory as defined in 326 IAC 2-7-1(21)(D).

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) OP 15-03-88-0095, issued on May 31, 1984; and
- (2) OP 15-03-88-0096, issued on May 31, 1984.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (1) OP 15-03-88-0095, issued on May 31, 1984

Condition 5: [Pursuant to 326 IAC 6-1-8.1 (Nonattainment Area Particulate Matter Limitations)], the particulate matter emissions [from furnace #1] shall be limited to 1 pound per ton of input process material, 15 pounds per hour and 64 tons per year.

Reason not incorporated: With limits of 15 pounds per hour and 64 tons per year, the source would be in violation of 326 IAC 6-1-8.1 (Nonattainment Area Particulate Matter Limitations), because 326 IAC 6-1-8.1 limits furnace #1 to 1 pound per ton of input process material, and only 48.0 tons per year.

- (2) OP 15-03-88-0095, issued on May 31, 1984

Condition 6: [Pursuant to 326 IAC 7-4-13 (Sulfur Dioxide Emission Limitations)], the sulfur dioxide emissions [from furnace #1] shall be limited to 1.4 pounds per million Btu's, 97 pounds per hour and 425 tons per year.

Reason not incorporated: The rule 326 IAC 7-4-13 limits the furnace #1 to 1.4 pounds per million Btu of heat input. The rule does not specify a limit in pounds per hour or tons per year. The limit of 1.4 pounds per million Btu of heat input shall remain part of the Title V permit; while the 97 pounds per hour and 425 tons per year shall not be part of the Title V permit.

- (3) OP 15-03-88-0096, issued on May 31, 1984

Condition 5: [Pursuant to 326 IAC 6-1-8.1 (Nonattainment Area Particulate Matter Limitations)], the particulate matter emissions [from furnace #2] shall be limited to 1 pound per ton of input process material, 11 pounds per hour and 49 tons per year.

Reason not incorporated: With limits of 11 pounds per hour and 49 tons per year, the source would be in violation of 326 IAC 6-1-8.1 (Nonattainment Area Particulate Matter Limitations), because 326 IAC 6-1-8.1 limits furnace #2 to 1 pound per ton of input process material, and 42.80 tons per year.

- (4) OP 15-03-88-0095, issued on May 31, 1984

Condition 6: [Pursuant to 326 IAC 7-4-13 (Sulfur Dioxide Emission Limitations)], the sulfur dioxide emissions [from furnace #2] shall be limited to 1.4 pounds per million Btu's, 81 pounds per hour and 355 tons per year.

Reason not incorporated: The rule 326 IAC 7-4-13 limits the furnace #2 to 1.4 pounds per million Btu of heat input. The rule does not specify a limit in pounds per hour or tons per year.

Note: This source was previously known as Diamond Thatcher Glass and is subject to the limits listed in 326 IAC 6-1-8.1 and 326 IAC 7-4-13 as those for Diamond Thatcher Glass.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on June 3, 1996.

A notice of completeness letter was mailed to the source on March 12, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	192
PM-10	187
SO ₂	227
VOC	105
CO	41.1
NO _x	1090

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
HCl	less than 10
Sb	less than 10
As	less than 10
Be	less than 10
Cd	less than 10
Cr	less than 10
Co	less than 10
Pb	less than 10
Mn	less than 10
Hg	less than 10
Ni	less than 10
Se	less than 10
TOTAL	less than 25

The potential emissions (as defined in 326 IAC 1-2-55) of PM, PM₁₀, VOC, SO₂, and NO_x are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	86.9
PM-10	83.0
SO ₂	166
VOC	12.5
CO	10.8
NO _x	393

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Glass Furnace #1	48.0	48.0	62.05	3.65	3.65	113.15	0.00
Glass Furnace #2	42.8	42.8	82.54	12.23	12.23	122.28	0.00
Batch Storage	188	188	0.00	0.00	0.00	0.00	0.00
Batch Weighing and Mixing	57.9	57.9	0.00	0.00	0.00	0.00	0.00
Batch Silo	188	188	0.00	0.00	0.00	0.00	0.00
Underground Conveyor	188	188	0.00	0.00	0.00	0.00	0.00
Total Emissions	712.7	712.7	144.59	15.88	15.88	235.43	0.00

County Attainment Status

The source is located in Dearborn County.

Pollutant	Status
PM-10	attainment
SO ₂	unclassifiable
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Dearborn County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) and 40 CFR Part 60 applicable to this source.

The furnaces #1 and #2 are not subject to the New Source Performance Standard (NSPS), 326 IAC 12, (40 CFR Part 60.290 Subpart CC) because they were constructed prior to June 15, 1979, the applicability date of this rule.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) 40 CFR Part 63 applicable to this source.

The parts washing station is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T, because the solvent used does not contain any of the following halogenated solvents in concentrations greater than five percent by weight: methylene chloride, 1,1,1-trichloroethane, trichloroethylene, perchloroethylene, carbon tetrachloride, or chloroform.

The furnaces are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart N, because arsenic compounds are not used as raw materials in the furnaces.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on June 3, 1996. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This existing source is a major stationary source because at least one attainment regulated pollutant is emitted at a rate of 250 tons per year. This source has never been reviewed under the requirements of PSD.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM, PM₁₀, SO₂, and NO_x. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Furnace #1, constructed in 1951

326 IAC 6-1-8.1 (Nonattainment Area Particulate Limitations)

Furnace #1 is a specifically regulated facility in 326 IAC 6-1-8.1. The particulate matter (PM) from the glass furnace #1 shall not exceed 1.0 pound per ton and 48.0 tons per year. In order to comply with the limit of 48.0 tons per year, the throughput to furnace #1 shall not exceed 96,009.6 tons per 12 consecutive month period. See Appendix A for detailed calculations.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The furnace #1 is subject to this rule because the potential to emit SO₂ is greater than 25 tons per year or 10 pounds per hour. Pursuant to this rule, when combusting number 2 fuel oil, the SO₂ emissions from the furnace #1 shall not exceed 0.5 pound per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 2 fuel oil shall not exceed 0.49 weight percent.

326 IAC 7-4 (Sulfur Dioxide Emission Limitations)

Pursuant to this rule and OP 15-03-88-0095, when combusting number 6 fuel oil, the SO₂ emissions from the furnace #1 shall not exceed 1.4 pounds per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 6 fuel oil shall not exceed 1.28 weight percent.

326 IAC 7-2-1 (Sulfur Dioxide Compliance Reporting)

Pursuant to this rule, a quarterly report shall be submitted including the average sulfur content, heat content, the sulfur dioxide emission rate in pounds per million Btu, and the fuel oil consumptions. Fuel sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-7-4 for oil combustion.

326 IAC 8-1-6 (Best Available Control Technology (BACT))

Furnace #1 is not subject to the requirements of 326 IAC 8-1-6 (BACT) because it was constructed prior to 1980. There are no other 326 IAC 8 rules that apply.

State Rule Applicability - Furnace #2, constructed in 1959

326 IAC 6-1-8.1 (Nonattainment Area Particulate Limitations)

Furnace #2 is a specifically regulated facility in 326 IAC 6-1-8.1. The particulate matter (PM) from the glass furnace #2 shall not exceed 1.0 pound per ton and 42.8 tons per year. In order to comply with the limit of 42.8 tons per year, the throughput to furnace #2 shall not exceed 85,594 tons per 12 consecutive month period. See Appendix A for detailed calculations.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The furnace #2 is subject to this rule because the potential to emit SO₂ is greater than 25 tons per year or 10 pounds per hour. Pursuant to this rule, when combusting number 2 fuel oil, the SO₂ emissions from the furnace #2 shall not exceed 0.5 pound per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 2 fuel oil shall not exceed 0.49 weight percent.

326 IAC 7-4 (Sulfur Dioxide Emission Limitations)

Pursuant to this rule and OP 15-03-88-0096, issued May 31, 1984, when combusting number 6 fuel oil, the SO₂ emissions from the furnace #2 shall not exceed 1.4 pounds per million Btu of heat input. In order to comply with this limit, the sulfur content of the number 6 fuel oil shall not exceed 1.28 weight percent.

326 IAC 7-2-1 (Sulfur Dioxide Compliance Reporting)

Pursuant to this rule, a quarterly report shall be submitted including the average sulfur content, heat content, the sulfur dioxide emission rate in pounds per million Btu, and the fuel oil consumptions. Fuel sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-7-4 for oil combustion.

326 IAC 8-1-6 (Best Available Control Technology (BACT))

Furnace #2 is not subject to the requirements of 326 IAC 8-1-6 (BACT) because it was constructed prior to 1980. There are no other 326 IAC 8 rules that apply.

State Rule Applicability - Raw Materials Batch Storage and Conveying Process

326 IAC 6-1-2 (Nonattainment Area Particulate Matter Limitations)

This process is not subject to the requirements of this rule because it does not have the potential to emit 100 tons or more of particulate matter per year and does not have actual emissions of 10 tons or more of particulate matter per year.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the raw materials batch storage and conveying process shall not exceed 42.9 pounds per hour. The baghouses ST6, ST7, ST8, and ST9 shall be in operation at all times that the raw materials batch storage and conveying process is in operation, in order to comply with this limit. See Appendix A for detailed calculations.

State Rule Applicability - Raw Materials Batch Weighing and Mixing Process

326 IAC 6-1-2 (Nonattainment Area Particulate Matter Limitations)

The particulate matter (PM) from the raw materials batch weighing and mixing process shall not exceed 0.03 grains per dry standard cubic foot of exhaust air. The baghouses ST10, ST11, and ST12 shall be in operation at all times that the raw materials batch weighing and mixing process is in operation, in order to comply with this limit.

State Rule Applicability - Raw Materials Batch Silo

326 IAC 6-1-2 (Nonattainment Area Particulate Matter Limitations)

This process is not subject to the requirements of this rule because it does not have the potential to emit 100 tons or more of particulate matter per year and does not have actual emissions of 10 tons or more of particulate matter per year.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the raw materials batch silo shall not exceed 42.9 pounds per hour. The baghouses ST4 and ST5 shall be in operation at all times that the raw materials batch silo is loading or unloading, in order to comply with this limit. See Appendix A for detailed calculations.

State Rule Applicability - Underground Conveyor

326 IAC 6-1-2 (Nonattainment Area Particulate Matter Limitations)

This process is not subject to the requirements of this rule because it does not have the potential to emit 100 tons or more of particulate matter per year and does not have actual emissions of 10 tons or more of particulate matter per year.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the underground conveyor shall not exceed 42.9 pounds per hour. The baghouse ST3 shall be in operation at all times that the underground conveyor is in operation, in order to comply with this limit. See Appendix A for detailed calculations.

State Rule Applicability - Cullet Crushing Operation

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the cullet crushing operation shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

State Rule Applicability - Mold Swabbing Operations

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the mold swabbing operation shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

State Rule Applicability - Hot End Treatment Process

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the hot end treatment process shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

State Rule Applicability - Parts Washing Station

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator of the cold cleaning facility shall:

- (a) equip the cleaner with a cover;
- (b) equip the cleaner with a facility for draining cleaned parts;
- (c) close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) provide a permanent, conspicuous label summarizing the operation requirements;
- (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

State Rule Applicability - Mold Shop Operations

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the mold shop operations shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

Compliance Monitoring - Furnace #1

The furnace #1 has applicable compliance monitoring conditions as specified below:

- (a) A quarterly report shall be submitted including the average sulfur content, heat content, the sulfur dioxide emission rate in pounds per million Btu, and the fuel oil consumptions. Fuel sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-7-4 for oil combustion.
- (b) Daily visible emissions notations of the furnace #1 stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (c) The Permittee shall maintain records of the daily visible emission notations of the furnace #1 stack exhaust.
- (d) During the period between 30 and 36 months after issuance of this permit or within 180 days after startup of furnace #1, whichever is later, the Permittee shall perform PM and SO₂ testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.
- (e) Records shall be kept of the monthly throughput to the furnace and a quarterly report shall be submitted using the forms included with the permit.

These monitoring conditions are required pursuant to 326 IAC 7-2 and to ensure compliance with 326 IAC 7-1.1 and 326 IAC 6-1-8.

Compliance Monitoring - Furnace #2

The furnace #2 has applicable compliance monitoring conditions as specified below:

- (a) A quarterly report shall be submitted including the average sulfur content, heat content, the sulfur dioxide emission rate in pounds per million Btu, and the fuel oil consumptions. Fuel sampling and analysis data shall be collected pursuant to the procedures specified in 326 IAC 3-7-4 for oil combustion.

- (b) Daily visible emissions notations of the furnace #2 stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (c) The Permittee shall maintain records of the daily visible emission notations of the furnace #2 stack exhaust.
- (d) During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM and SO₂ testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.
- (e) Records shall be kept of the monthly throughput to the furnace and a quarterly report shall be submitted using the forms included with the permit.

These monitoring conditions are required pursuant to 326 IAC 7-2 and to ensure compliance with 326 IAC 7-1.1 and 326 IAC 6-1-8.1.

Compliance Monitoring - Raw Materials Batch Storage Process

The raw materials batch storage process has applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the baghouses ST6, ST7, ST8, and ST9 stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (b) The Permittee shall maintain records of the daily visible emission notations of the baghouse stack exhausts.

- (c) The Permittee shall record the total static pressure drop across the baghouses ST6, ST7, ST8 and ST9 used in conjunction with the raw materials batch storage process, at least once daily when the raw materials batch storage process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses ST6, ST7, ST8 and ST9 shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
- (d) An inspection shall be performed each calendar quarter of all bags controlling the raw materials batch storage process when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (e) In the event that bag failure has been observed:
 - (1) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
 - (2) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.
- (f) The Permittee shall maintain records of the results of the baghouse inspections.

These monitoring conditions are required in order to ensure compliance with 326 IAC 6-3-2.

Compliance Monitoring - Raw Materials Batch Weighing and Mixing Process

The raw materials batch weighing and mixing process has applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the baghouses ST10, ST11, and ST12 stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (b) The Permittee shall maintain records of the daily visible emission notations of the baghouse stack exhausts.

- (c) An inspection shall be performed each calendar quarter of all bags controlling the raw materials batch weighing and mixing process when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (d) In the event that bag failure has been observed:
 - (1) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
 - (2) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.
- (e) The Permittee shall maintain records of the results of the baghouse inspections.
- (f) The Permittee shall record the total static pressure drop across the baghouses ST10, ST11, and ST12 used in conjunction with the raw materials batch weighing and mixing process, at least once daily when the raw materials batch weighing and mixing process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses ST10, ST11, and ST12 shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are required in order to ensure compliance with 326 IAC 6-1-2.

Compliance Monitoring - Raw Materials Batch Silo

The raw materials batch silo has applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the baghouses ST4 and ST5 stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (b) The Permittee shall maintain records of the daily visible emission notations of the baghouse stack exhausts.

- (c) An inspection shall be performed each calendar quarter of all bags controlling the raw materials batch silo when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (d) In the event that bag failure has been observed:
 - (1) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
 - (2) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.
- (e) The Permittee shall maintain records of the results of the baghouse inspections.
- (f) The Permittee shall record the total static pressure drop across the baghouses ST4 and ST5 used in conjunction with the raw materials batch silo, at least once daily when the raw materials batch silo is loading or unloading when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses ST4 and ST5 shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Condition C.13 - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

These monitoring conditions are required in order to ensure compliance with 326 IAC 6-3-2.

Compliance Monitoring - Underground Conveyor

The underground conveying process has applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the baghouse ST3 stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

- (b) The Permittee shall maintain records of the daily visible emission notations of the baghouse ST3 stack exhaust.
- (c) An inspection shall be performed each calendar quarter of all bags controlling the underground conveyor when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (d) In the event that bag failure has been observed:
 - (1) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
 - (2) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.
- (e) The Permittee shall maintain records of the results of the baghouse inspections.
- (f) The Permittee shall record the total static pressure drop across the baghouse ST3 used in conjunction with the underground conveyor, at least once daily when the underground conveyor is operating when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse ST3 shall be maintained within the range of 2.0 and 5.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are required in order to ensure compliance with 326 IAC 6-3-2.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

Conclusion

The operation of this glass container manufacturing operation shall be subject to the conditions of the attached proposed Part 70 Permit No. T029-6043-00007.

Allowable Emissions

Appendix A: Emission Calculations

Company Name: Anchor Glass Container Corporation
 Address City IN Zip: 200 West Belleview Drive, Lawrenceburg, Indiana 47025
 T: 029-6043
 Plt ID: 029-00007
 Reviewer: Nisha Sizemore

* * Process Emissions * *

Process:	Rate (tons glass/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Regenerative glass	17.54	PM	0.625	48.0	48.0	none	
melting furnace #1		PM-10	0.625	48.0	48.0		
Capacity: 421 tons/day		SO2	3.40	261.23	261.23		
		NOx	6.20	476.36	476.36		
SCC# 3-05-014-02		VOC	0.20	15.37	15.37		
AP-42 Ch. 11.15		CO	0.20	15.37	15.37		
		Lead	0.00	0.00	0.00		

Process:	Rate (tons glass/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Regenerative glass	14.58	PM	0.67	42.80	42.80	none	
melting furnace #2		PM-10	0.67	42.80	42.80		
Capacity: 350 tons/day		SO2	1.35	86.23	86.23		
		NOx	2.00	127.75	127.75		
		VOC	0.20	12.78	12.78		
		CO	0.20	12.78	12.78		

Note: The PM emission factor was taken from the results of a stack test conducted on October 27, 1998.

Methodology:

Ef = Emission factor

Ebc = Potential Emissions before controls = Rate (units/hr) x Ef(lbs/unit) x 8760 hrs/yr / 2000 lbs/hr

Eac = Potential Emissions after controls = (1-efficiency/100) x Ebc

1 lb = 2000 tons

Anchor Glass Container Corporation
200 West Bellevue Drive, Lawrenceburg, Indiana 47025

T 029-6043
Plt ID 029-00007

Process:	Rate (tons material/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Batch Handling	41.67	PM	0.3170	57.85	57.85	baghouse	
		PM-10	0.3170	57.85	57.85		
AP-42 4th Edition Table 8.19.1-1		SO2	0.00	0.00	0.00		
		NOx	0.00	0.00	0.00		
		VOC	0.00	0.00	0.00		

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates greater than 30 tons per hour:

$$P = 41.67 \text{ tons/hr}$$

$$\text{limit} = 55 \times (41.67^{0.11}) - 40 = 42.9 \text{ lb/hr} \quad (\text{allowable})$$

with potential:

$$57.85 \text{ tons/yr} \times 2000 \text{ lb/ton} / 8760 \text{ hr/yr} = 13.2 \text{ lb/hr} \quad (\text{will comply})$$

Methodology:

Ef = Emission factor

Ebc = Potential Emissions before controls = Rate (units/hr) x Ef(lbs/unit) x 8760 hrs/yr / 2000 lbs/hr

Eac = Potential Emissions after controls = (1-efficiency/100) x Ebc

1 lb = 2000 tons

Process:	Rate (tons glass/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Regenerative glass melting furnace #1 Capacity: 421 tons/day	10.96	PM	1.00	48.00	48.00	none	
		PM-10	1.00	48.00	48.00		
		SO2	3.40	163.22	163.22		
		NOx	6.20	297.63	297.63		
SCC# 3-05-014-02		VOC	0.20	9.60	9.60		
AP-42 Ch. 11.15		CO	0.20	9.60	9.60		
		Lead	0.00	0.00	0.00		

96009.6 tons/yr

Process:	Rate (tons glass/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Eac (ton/yr)	Type of control	Control Efficiency (%)
Regenerative glass melting furnace #2 Capacity: 350 tons/day	9.77	PM	1.00	42.80	42.80	none	
		PM-10	1.00	42.80	42.80		
		SO2	1.35	57.78	57.78		
		NOx	2.00	85.59	85.59		
		VOC	0.20	8.56	8.56		
85594 tons/yr		CO	0.20	8.56	8.56		

Furnaces**Appendix A: Emission Calculations
Industrial Boilers
#5 and #6 Fuel Oil**

Company Name: Anchor Glass Container Corporation
Plant Location: 603 East North Street, Winchester, Indiana
County: Randolph
Permit Reviewer: Nisha Sizemore
Title V #: 135-6042-00012

Heat Input Capacity
MMBtu/hr

10.50

Potential Throughput
kgals/year

661.726619

S = Weight % Sulfur

1.28

Emission Factor in lb/kgal	Pollutant				
	PM	SO2	NOx	VOC	CO
	15 <i>*see below</i>	200.96 (157S)	55.0	0.28	5.0
Potential Emission in tons/yr	5.0	66.5	18.2	0.1	1.7
Potential Emission in lbs/MMBtu	0.1	1.4			

***Particulate Matter emission factor for #5 fuel oil is 10.0 lb/kgal**

***Particulate Matter emission factor for #6 fuel oil 9.19(s) + 3.22 lb/kgal**

Methodology

1 gallon of #5 Fuel oil has a heating value of 139,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.139 MM Btu

Emission Factors are from AP42 Tables 1.3-2 and 1.3-4 (SCC 1-02-004-01/02/03 and 1-02-004-04)

Emission (tons/yr) = Throughput (kgals/year) x Emission Factor (lb/kgal)/2,000 lb/ton